

Application SN: 10/658,950
Amendment Dated: October 19, 2006
Reply to Office Action of: July 20, 2006

REMARKS

The Office Action dated July 20, 2006, has been reviewed. It is noted that the Examiner has accepted the drawings submitted September 9, 2003, for examination purposes. Enclosed herewith are replacement drawing sheets formalizing the drawings originally submitted.

The claim objections have also been noted and, as presented herewith, are believed to obviate these objections.

Turning now to substantive issues, Claims 1 to 4, 8 and 10 to 12 have been rejected as being obvious over Wilson, U.S. Patent No. 5,368,053, further in view of Lee, U.S. Patent No. 5,349,708.

The Applicants' invention is a parts washer for parts such as automotive parts. The washer utilizes a cleaning solution, preferably a biodegradable solution. The parts washer is highly versatile, providing the combined features of three different types of parts washing units. First, the unit can be used as a manual parts washing sink in which a mechanic can place parts and clean the parts using a brush which is supplied with washing fluid from a pump in fluid communication with a reservoir in the cabinet. Secondly, the washer can also be used as an automatic jet washer. The sink and the cabinet encloses the top of the cabinet and can be opened to access the subjacent jet washer. Parts can be placed in a receptacle such as a basket in the jet washer and, once

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placed in the jet washer, the sink is moved to a position closing jet washer. A manifold sprays the parts with a cleaning solution by means of a pump communicating with the reservoir. In the third use, the device may be used as a washer for cleaning parts on a vehicle. For example, a mechanic working on vehicle brakes would normally elevate the
5 vehicle on a lift. The present invention can be moved to a position beneath the vehicle and parts such as brake parts washed in place with the sink disposed below the part(s) to catch cleaning solution and contaminants removed by the use of the brush.

The washer has a cabinet which defines a reservoir in the lower part of the cabinet and the jet washer compartment. As mentioned above, a receptacle or basket for
10 receiving parts to be washed is located within the jet washing compartment and is mounted for rotation, either in by means of a gear motor or by suction such as fluid flow.

The pump has an inlet near the bottom of the housing in the reservoir and will deliver pressurized fluid to the manifold spray or to the hand washer.

The sink, which operates as a sink usable for washing manual parts and also as a
15 door or closure for the jet washing compartment is provided with a central drain which discharges through a strainer to the fluid reservoir in the lower compartment of the cabinet.

Accordingly, the present invention provides a highly versatile automotive and mechanical parts washer which provides combined features of three different washing

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units. The multiple, or three-function, device integrates these operations and results in a very versatile device.

5 With prior art units, shops found it necessary to purchase multiple units which adds substantially to overhead costs and to inefficiencies in operation. With the present invention, a mechanic can perform as many as three tasks with a single washing unit without having to transfer messy, dripping parts from location to another.

10 The patent '053 patent to Wilson shows a machine for cleaning parts which includes a reservoir and two tanks. A wash solution is contained in one of the tanks and a rinse solution contained in the other tank. Pumps transfer the wash and rinse solutions from the tanks to the reservoir. A basket for holding the parts is movable between a loading position, cleaning position and a draining position. When the basket is in the cleaning position inside the reservoir is rotated in an opposite direction to improve cleaning efficiency. The Examiner acknowledges that Wilson fails to teach a sink attached to the device.

15 The '708 patent to Lee is cited as teaching a foldable kitchen sink supported upwardly by legs attached to a dishwasher bucket which is detachably seated on a middle section of member 1. Lee's device is not intended for use to wash automotive parts and it is to be understood Applicants' sink does not simply claim the attachment of a foldable sink to a parts washing device. Rather, as pointed out above, the sink can serve as a parts

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washing sink and also serves as the door or closure for the subjacent jet washing section.

There is no suggestion within either of the references to make such a combination.

The Examiner also states the sink of Lee, '708 patent, may be guided horizontally along a pair of rails 1b on the linear surface of the apparatus (column 4, lines 43-45). The
5 Examiner concludes this reads on the Applicants' claim for a sink positionable on a cabinet having a closed and open position.

As understood, the reference to the Lee specification does not relate to movement of the sink, but rather to sliding reciprocation of panels such as panels 4 and 5. The sink numeral 10, referred to as a dishwasher bucket, is insertable in a rectangular opening of
10 the support member. Thus, the combination suggested by the Examiner would not result in the Applicants' invention, but rather would result in a parts washer having a sink attached to or suspended from the structure.

To reject under 35 U.S.C. §103 under a combination of references, such combination is proper only if there is some objective teaching in the prior art that would
15 lead one of ordinary skill to combine the relevant teachings of the references. *The test is whether the claimed invention considered as a whole would have been obvious.* As pointed out above, for prior art references to be combined, there must be something in the prior art, as whole, that suggests the desirability and, thus, the obviousness of making the

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combination. The teachings of the two references being from such diverse fields would not suggest the desirability of the combination the Examiner suggests.

Further, as pointed out above, even if the combination were appropriate, the resulting device would not be in any way suggestive of the Applicants' claimed invention.

5 Claim 1 has been amended herewith to more particularly point out the structural and functional features of the washer, particularly the relationship of the sink and cabinet in which the sink is usable both independently as a sink and also serves as an openable and closeable door for the subjacent jet washing.

10 The Examiner's attention is also directed to the enclosed Declaration from an individual with 36 years of experience in the area of parts washing equipment. It is noted that the declarant, Mr. Kuehnert, indicates that in this period of time he has never seen a multiple function sink washer of the type invented by the Applicants. In addition, the absence of such a washer would point to a long felt need. Mr. Kuehnert opines on the differences between the Applicants' invention and prior art devices further emphasizes
15 the advantages achieved by the Applicants' parts washer. Mr. Kuehnert also examines the primary references. Mr. Kuehnert is highly experienced in this field and his declaration testimony is entitled weight, summarizing his interpretation of the basis of the rejection. F.R.E. §704

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As mentioned above, Claim 1 has been amended to more particularly point out and amplify the Applicants' invention.

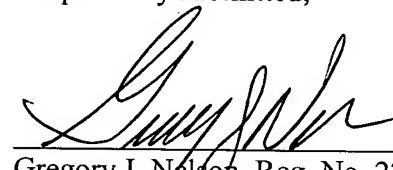
The remaining claims are all either directly or indirectly dependent on Claim 1 and are urged allowable for the reasons set forth above.

5 A favorable action is respectfully solicited.

Respectfully submitted,

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